STATE OF IDAHO
DEPARTMENT OF AGRICULTURE

DIRK KEMPTHORNE
Governor
PATRICK A. TAKASUGI
Director

February 3, 2005

Bureau of Land Management
Attn: Eric Limbach
FMDA Project Manager
4350 Cliffs Drive
Pocatello, Idaho 83204

Dear Mr. Limbach:

The Idaho State Department of Agriculture (ISDA) appreciates the Bureau of Land Management's (BLM) efforts to address fire and fuels management in the Eastern Idaho Cooperative Fire Management District, and the opportunity to comment on the Draft Fire, Fuels, and Related Vegetation Management Direction Plan Amendment and Environmental Impact Statement (DEIS). The plan's stated intent, to develop a comprehensive directive for the management of Fire, Fuels, and Related Vegetation Management by providing guidance through clearly stated objectives, policies, and resource goals, is commendable. ISDA would like to support your efforts by providing direction to enable incremental steps toward long-term goals of more natural fire conditions and related vegetative communities throughout the landscape.

ISDA's remarks are organized to comment on the merits of each alternative as they relate to the purpose and need of this plan. The DEIS states, "Current land use plans do not address fire management issue in a comprehensive way…Amending the land use plans is necessary in order to integrate comprehensive fire management direction into the land use plans." (pg. S-2) ISDA contends that neither the Proposed Action, nor the Preferred Alternative provides for a "comprehensive fire management direction." The comments that follow explain our reasoning for this assertion. We also incorporate ideas from the analyzed alternatives and suggest an additional alternative to better meet the stated objectives, and to aid the deciding officer's final decision.

General

ISDA is concerned that the DEIS may be too ambitious in the targeted acres to be treated. Funding is always inadequate and inconsistent so the BLM should be cautious in projecting goals and objectives that may not be realistically achievable. This situation is common and creates several complications. One, litigation by unsatisfied user groups is more likely because the BLM is unable to fulfill objectives of the DEIS and Land Use Plans (LUPs). Second, cooperators become dissatisfied with the inability of the BLM to fulfill their commitments and are less likely to participate in collaborative

programs and projects primarily because they don't want to engage in a process that is foreseen as a waste of their limited time and resources.

Alternative B

The proposed alternative, Alternative B, though it does satisfy certain aspects of the purpose and need of the action, does not address it in a comprehensive manner. The DEIS admits that this alternative does not "…treat all cover types to a level that returns the fire regime to the range of historical variability." (pg. 2-22) The DEIS also implies that Alternative B would be "…limited by existing operations capabilities and resources." (pg. 2-22)

Alternative B also does not effectively address Issue 1, which stemmed from the scoping process that drove the development of alternatives (Section 1.4.1). The DEIS even recognizes this fact: "The Proposed Action does not incorporate the recommended level of treatment in the national-scale program option…" nor does it "…directly address the goals and priorities…" of the Cohesive Strategy/10-year Comprehensive Strategy prepared by the USDA for restoring fire's natural role in the ecosystem. (pg. 1-10)

Alternative D

Alternative D, the preferred alternative, changes the direction of the plan entirely and inadequately addresses the purpose and need of the plan. Though Alternative D was formulated to address Issue 2, which deals with sagebrush obligate species, it should be remembered that this is a Fire, Fuels, and Related Vegetation Management Direction Plan and not a habitat conservation directive for sage steppe obligates. If the BLM selects this alternative, the BLM will miss out on a great opportunity to return fire regimes to the range of historical variability, and provide for a complete and healthy range ecosystem.

If Alternative D is chosen, the BLM will also limit itself to treating only certain types of vegetative cover, in this case, low-elevation shrub, perennial grass, annual grass, mid-elevation, shrub, mountain shrub, and juniper. These are not all types of habitats which are under BLM's jurisdiction where fire historically played a critical role in vegetation health. Cover types not included in Alternative D are aspen/conifer and dry conifer vegetation types. Aspen is a critical part of western landscapes as it provides forage for livestock, habitat for wildlife, watershed protection, and water yield for downstream users, esthetics, recreational opportunities, and landscape diversity (Bartos and Cambell 1998). Bartos and Cambell also state that not only is plant diversity reduced, but for every 1,000 acres converted to mixed conifer stands 250-500 acre-feet of water is transpired into the atmosphere and is not available for streamflow or undergrowth production. Additionally, 500-1,000 tons of undergrowth biomass is not produced. Of this biomass 40-60 percent is usable forage for livestock and wildlife, the remaining is valuable hiding and thermal cover for wildlife. Records indicate Idaho has already lost approximately 60 percent of its aspen ecotypes emphasizing the impact of this community change to the state of Idaho.

None of BLM's field offices covered by this DEIS have a Fire Regime Condition Class (FRCC) of 1, meaning that aspen stands in the Upper Snake River District are predominately made up of late successional forest. As a result, most of BLM's seral aspen stands have been taken over by conifer

and stable aspen stands are decadent. Late successional aspen stands greatly alter available water, undergrowth biomass production, and biodiversity (Bartos 2005). The BLM must include this important vegetation type to properly manage watersheds, and assist the state of Idaho in meeting its objectives for a sustainable forage base for livestock grazing, wildlife habitat and disease control, and water production.

Alternative D also does not return juniper woodlands to their historical fire regime. As stated in the DEIS, juniper and pinyon woodlands have expanded ten-fold in the last 130 years in the Intermountain West (pg. 3-13), due in large part to fire suppression. Though important to several wildlife species, juniper woodlands and associated encroachment leads to a depleted understory, and increased hillslope runoff and erosion. Many juniper-dominated watersheds produce less water and many springs and meadows within them have dried up. Juniper dominated stands can also shorten the growing season of surrounding plants by as much as six weeks because of juniper's extensive root system (Pierson 2005).

ISDA appreciates the BLM's efforts in sage grouse recovery and we support any attempt at improving sage grouse habitat. Alternative D is more than adequate at accomplishing that mission for the Upper Snake River District. However, the purpose and need of the plan isn't to develop a landscape strategy to benefit sage grouse and the Sagebrush Guild. Doing so would come at a cost of not having good rangeland health on all landscape levels.

Alternative C

As outlined above, Alternatives B and D do not accomplishment the purpose and need of the plan. Alternative C or some variation thereof, if chosen, would more effectively fulfill the purpose and need of the plan and move the landscape toward Desired Future Conditions as outlined in Table 2-1, page 2-5. Alternative C would create a wildland fire regime within the historic range of variability for all cover types. The DEIS states, "…most fire regimes have been altered, resulting in shifts toward Annual Grass cover types, loss of desirable sagebrush steppe, encroachment of junipers, and decadence in Mountain Shrub, Aspen/Conifer, and Dry Conifer cover types." (pg. 3-30) Alternative C is equal to Alternative D in providing the greatest long-term benefits for Annual Grass habitat (pg. 4-99), and Perennial Grass habitat (pg. 4-99), and have a more desirable impact on the Juniper and Mountain Shrub Guild (pg. 4-104), and Wet/Cold Conifer cover types (pg. 4-106) than all other alternatives.

Alternate Alternative

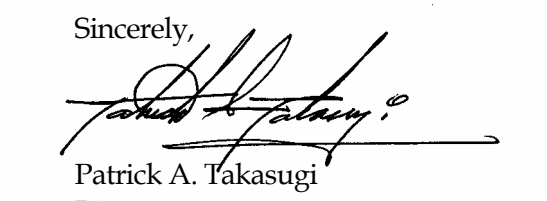
As mentioned earlier, the sagebrush steppe habitat is an extremely critical component to the long-term integrity of sage grouse populations, and ISDA supports efforts to improve sage grouse habitat. One shortcoming of Alternative C is that it doesn't sufficiently address Issue 2 and could have potential negative impacts on sagebrush steppe obligate species. The DEIS states, "Even though Alternative C more closely mimics the historical fire regime, it is not sensitive to the needs of the Sagebrush Guild." (pg. 4-85) This situation could easily be remedied if the treatments outlined for the sagebrush steppe ecosystem in Alternative D were incorporated into Alternative C. Two specific elements that could be incorporated into Alternative C are Alternative D's treatments in Low-

elevation Shrub and Perennial Grass ecosystems. As acknowledged by the DEIS in Section 4.4, this would speed up the process in converting Perennial Grass to sagebrush steppe habitat in the short term, and improve the proportion of 15- to 30-year sagebrush age class and significantly reducing cheatgrass in the long term.

Again, ISDA would like to emphasize that the BLM should not select the Preferred Alternative. If the BLM proceeds with Alternative D, they will limit their range of management options by focusing on a single species of sagebrush obligate (sage grouse). This will not give the BLM the needed flexibility to manage all types of ecosystems, especially if and when public policy and political forces switch their focus from sagebrush obligate species to other potential species of interest in the next 10 years.

ISDA recommends adopting Alternative C, with the suggested changes, as the Proposed Action.

Sincerely,



Patrick A. Takasugi
Director
Idaho State Department of Agriculture

Bartos, Dale and Robert B. Cambell, Jr. 1998. Decline of quaking aspen in the Interior West—examples from Utah. *Rangelands* 20(1):17-24.

Bartos, Dale. 2005. Aspen, a critical component of the southern Idaho landscape. *Symposium*: Aspen and Conifers in Rangelands. Idaho Section Society for Range Management Annual Meeting, January 6, 2005.

Pierson, Frederick B. 2005. Juniper encroachment and the hydrologic cycle: What do we know? *Symposium*: Aspen and Conifers in Rangelands. Idaho Section Society for Range Management Annual Meeting, January 6, 2005.